

March 13, 2008

Department of the Interior
Minerals Management Service (MS 4024)
Attn: Rules Processing Team (Comments)
381 Elden Street
Herndon, VA 20170-4817

Re: RIN 1010-AD 11; Sub Part J-Pipelines and Pipeline Rights-of-Way
FR Vol. 72, No. 191 10-03-07

Dear Sir or Madam:

The Independent Petroleum Association of America (IPAA) appreciates the opportunity to provide written comments on the proposed rule to amend regulations for pipelines and pipeline rights-of-way, as provided in the October 3, 2007 Federal Register Notice. We also want to thank you for conducting the workshop on February 22 and extending the comment period to March 17, 2008.


IPAA represents thousands of independent petroleum and natural gas producers across the country. Independents drill 90 percent of domestic oil and natural gas wells, produce 68 percent of domestic oil and produce 85 percent of domestic natural gas. A number of our members conduct oil and natural gas production and pipeline-related activities offshore and are impacted by this rulemaking.

Although IPAA commends the efforts of MMS to rewrite 30 CFR Subpart J to use plain language and to restructure the rule to clarify current regulations, there are several concerns that can potentially have a significant impact to offshore oil and natural gas development without improving safety, efficiency or environmental performance.

Additionally, based on industry's review of the proposed rule, MMS has significantly understated the cost impacts to industry. We feel strongly that this is a major rulemaking, yet it provides minimal benefits. The proposed streamlined rule actually lengthens the permitting approval process, creates prescriptive reporting, inspection and record keeping requirements, and creates numerous duplications and conflicts with existing Department of Transportation (DOT) requirements. The agency provided no information in the proposed rulemaking that would justify the need for this approach.

IPAA recommends that the MMS work jointly with DOT and industry in developing performance-based, comprehensive regulations where regulations are needed to improve safety, reliability and environmental performance.

Sincerely,



Dan Naatz
VP, Federal Resources & Political Affairs